

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
Maureen Anita Flanders
Debtor(s)

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Chapter 13
Case No.: 19-15621-ELF

**SUPPLEMENTAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR SERVICES PERFORMED AFTER CONFIRMATION OF CHAPTER 13 PLAN**

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Brad J. Sadek, Esquire applies under § 330 of the Code for an Order directing the Chapter 13 Trustee to pay an award of compensation and reimbursement of actual, necessary expenses for services performed after confirmation of the above-mentioned debtor's chapter 13 plan and represents:

1. The debtor(s) filed a petition under Chapter 13 of the September 10, 2019.
3. This Court has previously approved an Application for Compensation of Counsel Fees in the amount of \$4,250.00.
4. Applicant requests an award of supplemental compensation of \$1,250.00 for 4.9 hours expended in providing the following services:

Date	Work Completed	By Whom	Hours
02/08/2021	Correspondence to Debtor regarding Notice of Default	Attorney	0.3
02/26/2021	Correspondence to Debtor regarding Certificate of Default	Attorney	0.3
03/03/2021	Correspondence with Debtor to review mortgage issues	Attorney	0.5
03/8/2021- 3/14/2021	Extended correspondence with Debtor to review surrendering vehicle	Attorney	1.0
04/22/2021	Correspondence to Debtor regarding Motion to Dismiss for Payments	Paralegal	0.3
04/22/2021	Additional correspondence on vehicle status, case status, mortgage status	Attorney	0.5
04/29/2021	Preparation of Motion to Modify Plan, Modified Plan, Amended Sch J and review of the same with Debtor	Attorney	1.5
04/29/2021	E-filing of Motion to Modify Plan, Modified Plan, Notice of Motion, Amended Sch J and service of the same	Paralegal	0.5

Total Hours: 4.9

- 5. Applicant requests that compensation be awarded at the following hourly rate(s):
Attorney Fees: \$335.00/hr
Paralegal Fees: \$125.00 hr
6. Applicant requests reimbursement of expenses in the amount of \$0.00.
7. Attached as Exhibit B is a copy of the applicants time records setting forth the dates and amount of time expended for the services performed on behalf of the debtor after confirmation of debtor's chapter 13 plan.
8. All services rendered and expenses incurred for which compensation or reimbursement is requested

a. were performed or incurred for or on behalf of the debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable; and

b. are not duplicative of services and expenses for which compensation or reimbursement was previously requested.

9. If this supplemental application is granted, the debtor's confirmed chapter 13 plan (check whichever is applicable) /

☒ is adequately funded.

☐ is not adequately funded.

10. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C §504(c) applies.

WHEREFORE, Applicant requests an award of \$ **1,250.00** in compensation and of \$ in reimbursement of actual, necessary expenses.

Dated: **November 18, 2021**

Signed: **/s/ Brad J. Sadek, Esquire**
Applicant

By: **Brad J. Sadek, Esquire**

Name: **Sadek and Cooper**

Address: **1315 Walnut Street**

Suite 502

Philadelphia, PA 19107

Phone No.: **215-545-0008**

Fax No.: **215-545-0611**